

Rosemary M. Rivas (SBN 209147)

rnr@classlawgroup.com

David Stein (SBN 257465)

ds@classlawgroup.com

Rosanne L. Mah (SBN 242628)

rlm@classlawgroup.com

GIBBS LAW GROUP LLP

505 14th Street, Suite 1110

Oakland, California 94612

Telephone: (510) 350-9700

Fax: (510) 350-9701

1000 1000 1000 1000 1000 1000 1000 1000 1000

## *Attorneys for Plaintiffs*

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

ADAM PLUSKOWSKI, RICKY BARBER, LUCILLE JACOB, CARLA WARD, PEPPER MILLER, and CINDY BRADY, on behalf of themselves and all others similarly situated,

Case No. 8:22-cv-00824

## **JOINT NOTICE OF SETTLEMENT**

### **Plaintiffs.**

V.

HYUNDAI MOTOR AMERICA,  
HYUNDAI MOTOR COMPANY,  
KIA AMERICA, INC., and KIA  
CORPORATION.

## Defendants.

**TO THE COURT AND ALL PARTIES AND THEIR ATTORNEY(S) OF RECORD:**

Please take notice that, in accordance with Local Rule 40-2 of the Local Civil Rules of the United States District Court for the Central District of California, Plaintiffs Adam Pluskowski, Ricky Barber, Lucille Jacob, Carla Ward, Pepper Miller, and Cindy Brady, along with the plaintiffs in the related actions titled *Zakikhani, et al. v. Hyundai Motor Company, et al.*, No. 8:20-cv-01584-SB-JDE (C.D. Cal.) (“*Zakikhani*”) and *Evans, et al. v. Hyundai Motor Company, et al.*, No. 8:22-cv-00300-SB-JDE (C.D. Cal.) (“*Evans*”)) have reached a proposed class action settlement with Defendants Hyundai Motor America, Hyundai Motor Company, Kia America, Inc., and Kia Corporation.

The undersigned stated in the Joint Stipulation filed on August 10, 2022 that they reached a settlement agreement in principle and apologize for not separately filing a notice of settlement and for any inconvenience and confusion caused to the Court. The motion for preliminary approval of the class action settlement was then filed with the Court on August 15, 2022 in *Zakikhani* (Dkt. No. 115).

The Parties have since filed in *Zakikhani* a stipulation seeking consolidation of this action with *Zakikhani* and *Evans*, and that all future filings occur in *Zakikhani*.

DATED: August 31, 2022

Respectfully submitted,

## **GIBBS LAW GROUP LLP**

By: /s/ Rosemary M. Rivas

Rosemary M. Rivas (SBN 209147)  
David Stein (SBN 257465)  
Rosanne L. Mah (SBN 242628)  
505 14th Street, Suite 1110  
Oakland, California 94612  
Telephone: (510) 350-9700  
Facsimile: (510) 350-9701  
[rnr@classlawgroup.com](mailto:rnr@classlawgroup.com)  
[ds@classlawgroup.com](mailto:ds@classlawgroup.com)  
[rlm@classlawgroup.com](mailto:rlm@classlawgroup.com)

*Attorneys for Plaintiffs*

/s/ Lance A. Etcheverry  
LANCE A. ETCHEVERRY (SBN 199916)  
lance.etcheverry@skadden.com  
CAROLINE VAN NESS (SBN 281675)  
caroline.vanness@skadden.com  
MICHAEL C. MINAHAN (SBN 311873)  
michael.minahan@skadden.com  
SKADDEN, ARPS, SLATE, MEAGHER &  
FLOM LLP  
525 University Avenue, Suite 1400  
Palo Alto, California 94301  
Telephone: (650) 470-4500  
Facsimile: (650) 470-4570

JOHN BEISNER (SBN 81571)  
john.beisner@skadden.com  
SKADDEN, ARPS, SLATE, MEAGHER &  
FLOM LLP  
1440 New York Avenue N.W.  
Washington, D.C. 20005  
Telephone: (202) 371-7000  
Facsimile: (202) 393-5760

## *Attorneys for Defendants*

1 I, Rosemary M. Rivas, attest that the signatories listed above, and on whose behalf  
2 this filing is submitted, concur in the filing's content and have authorized the filing.  
3  
4

/s/ Rosemary M. Rivas

10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28